

DAYLE ELIESON  
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District of Nevada  
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAINE CARROLL,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02237-MMD-PAL

**JOINT STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR  
REVERSAL OR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for one week from March 21, 2018 to **March 28, 2018**. This is Defendant's sixth request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was sick and had chronic migraines, which impaired her vision at the time of her last extension request. Counsel continues to have chronic debilitating migraines and headaches on the date of the current filing deadline. As a result, Counsel became behind on her heavy caseload, which consists of over 75+

1 District Court cases, which require 2 or more dispositive motions per week and three pending Ninth  
2 Circuit matters. In addition, the Ninth Circuit matters require additional levels of review. Counsel  
3 has one of her Ninth Circuit matters due for review on the date of the current filing deadline, which  
4 she was unaware of at the time of the last extension request. Due to unanticipated leave and heavy  
5 workload, Counsel needs additional time to prepare a response to the Motion. Counsel apologizes for  
6 the belated request, but was unaware of scheduling conflicts in her other matters and did not expect to  
7 take additional sick leave from her chronic migraines. Defendant makes this request in good faith with  
8 no intention to unduly delay the proceedings.  
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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

2 Respectfully submitted,

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4 Dated: March 21, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on March 21, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

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6  
7  
8 Dated: March 21, 2018

DAYLE ELIESON  
Acting United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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12 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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15 **ORDER**

16 APPROVED AND SO ORDERED:

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19 DATED: March 23, 2018

  
THE HONORABLE PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**  
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via  
5 the method of service identified below:

6 **CM/ECF:**

7  
8 Cyrus Safa  
9 Law Offices of Lawrence D. Rohlfing  
10 12631 E. Imperial Highway, Suite C-115  
11 Santa Fe Springs, CA 90670  
12 562-868-5886  
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14 Email: cyrus.safa@rohlflinglaw.com

15  
16 Gerald Welt  
17 Gerald M. Welt, Chtd.  
18 703 S. 8th St.  
19 Las Vegas, NV 89101  
20 702-382-2030  
21 Fax: 702-684-5157  
22 Email: gmwesq@weltlaw.com

23  
24 Attorneys for Plaintiff

25  
26 Respectfully submitted this 21st day of March 2018,

27  
28 /s/ Tina L. Naicker  
29 TINA L. NAICKER  
30 Special Assistant United States Attorney